

## TRANSMITTAL OF APPEAL BRIEF (Large Entity)

Docket No.

RSW920010005US1

In Re Application Of: Jason Yi Blakely and Robert S. Sielken

Application No.	Filing Date	Examiner	Customer No.	Group Art Unit	Confirmation No.
09/864,547	May 24, 2001	P. Ke	46270	2174	

Invention: MULTIPLE LOCALE BASED DISPLAY AREAS

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COMMISSIONER FOR PATENTS:

Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on April 7, 2005

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Dated: August 30, 2005

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PATENT

Docket No. RSW920010005US1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

INVENTORS: **Jason Yi Blakely and Robert S. Sielken**

APPLICATION NO. **09/864,547**

FILED: **May 24, 2001**

Examiner: P. Ke

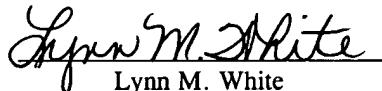
Art Unit: 2174

TITLE: **MULTIPLE LOCALE BASED DISPLAY AREAS**

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**Attention: Board of Patent Appeals and Interferences**

**APPELLANTS' BRIEF**

This brief is in furtherance of the Notice of Appeal filed in this case on April 7, 2005.

This brief is transmitted in triplicate. The requisite fee (\$500.00) set forth in §1.17(f) is authorized to be charged to Deposit Account No. 09-0461.

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**1. REAL PARTY IN INTEREST**

The present application is assigned to International Business Machines Corporation, having its principal place of business at New Orchard Road, Armonk, New York 10504. Accordingly, International Business Machines Corporation is the real party in interest.

**2. RELATED APPEALS AND INTERFERENCES**

Applicant is not aware of any appeals or interferences related to the present appeal.

**3. STATUS OF CLAIMS**

- A. Claims canceled: none
- B. Claims withdrawn from consideration but not canceled: None
- C. Claims pending: 1-32
- D. Claims allowed: none
- E. Claims rejected: 1-32
- F. Claims appealed: 1-32

Appealed claims 1-32 as currently pending are attached as Appendix A hereto.

**4. STATUS OF AMENDMENTS**

A Reply under 37 C.F.R. §1.111 was filed on June 14, 2004 and resulted in the final Office Action appealed herein. A Reply after final containing no amendments to the claims was filed in the present case on December 6, 2004. A Petition for Revival of an Application for Patent Abandoned Unintentionally, along with a Notice of Appeal, was filed on April 7, 2005. The Petition was granted on June 30, 2005.

**5. SUMMARY OF THE CLAIMED SUBJECT MATTER**

Claim 1: A method for displaying information in a display area comprising the steps of: associating a first set of information with a first locale designation (*page 5, lines 11-18*); associating a second set of information with a second locale designation (*page 5, line 19-page 6, line 4*); displaying data from said first set of information in accordance with properties of said first locale designation (*page 7, lines 1-6*); and displaying data from said second set of information in accordance with properties of said second locale designation, said data from said first and second set of information displayed simultaneously on the display area (*page 7, lines 1-17*).

Claim 13: A graphical user interface (GUI) comprising: a first display area for displaying data from a first set of information in accordance with properties of a first locale designation (*page 8, line 15-page 9, line 12*); and a second display area for displaying data from a

second set of information in accordance with properties of a second locale designation (*page 9, line 13-page 10, line 3*).

Claim 23: A graphical user interface (GUI) comprising: a plurality of display areas; a first of said display areas for displaying source information associated with a source locale designation; one or more of said display areas for displaying target information, each of said one or more of said display areas for displaying target information corresponding to one of one or more target locale designations; and other display areas not associated with said source locale designation or said one or more target locale designations associated with a system locale designation (*page 8, line 15-page 10, line 12*).

Claim 25: A system for displaying information associated with multiple locales, said system comprising: means for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and means for displaying said first and second set of information (*page 7, line 18-page 15, line 13; this is a means-plus-function claim and the structures, materials or acts corresponding to the claimed function are set forth in the text identified*).

Claim 29: A computer program product for displaying information associated with multiple locales, said computer program product comprising: computer readable program code embodied in a computer readable medium, the computer readable program code comprising at least: computer readable program code for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and

computer readable program code for displaying said first set of information associated with said first locale designation and said second set of information associated with said second locale designation (*page 7, line 18-page 15, line 13; this is a means-plus-function claim and the structures, materials or acts corresponding to the claimed function are set forth in the text identified.*)

This invention deals with problems associated with the display of information in multiple languages in a computer system, and in particular, such display in a Graphical User Interface. Although not limited to such an application, the present invention finds particular utility in translation programs where it is commonplace for multiple-language displays to be rendered for the user. In prior art systems, the display of the multiple-language information is limited to a display based on the selection of a single locale, typically the locale in which the program is being used. For example, if a translation program for translating Spanish to French is used in the United States (a predominately English-speaking locale), then if the computer on which the translation program resides is set for use in a locale identified as the United States, U.S. protocols for such things as alphabetization are based on English language protocols and English language characters. As an example, the Spanish language contains the character "á." According to a USA locale designation this would be treated as a special character which would come somewhere after "z" in an alphabetically sorted order. In a Spanish locale designation sorted order, however, "á" would be located between "a" and "b." Accordingly, Spanish words which begin with "á" would not

be located where an operator would expect to find them if sorted according to a USA locale designation.

The present invention overcomes this problem by allowing multiple locales to be selected for information being displayed in a single display area (e.g., a GUI), with information associated with a first locale being displayable in accordance with properties of the first locale while information associated with a second locale being simultaneously displayable in accordance with properties of the second locale.

## **6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

Applicant requests the Board to review the rejection of the claims under 35 U.S.C. §102 based on U.S. Patent No. 6,122,606 to Johnson.

## **7. ARGUMENT**

### **A. The Cited Prior Art Does Not Anticipate the Claimed Invention**

The MPEP and case law provide the following definition of anticipation for the purposes of 35 U.S.C. §102:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."  
MPEP §2131 citing *Verdegaal Bros. v. Union Oil Company of California*, 814 F.2d 628, 631, 2 U.S.P.Q. 2d 1051, 1053 (Fed. Cir. 1987)

**U.S. Patent No. 6,122,606 to Johnson**

U.S. Patent No. 6,122,606 to Johnson ("Johnson") teaches a system and method for enhancing human communications. Johnson is a translation program that uses translation rules to correlate a first language with a second language, and then communicate a communication, initially formulated in the first language, in the second language.

**B. Claims 1-12**

Claims 1-12 include the requirement that a first set of information be associated with a first locale designation; that a second set of information be associated with a second locale designation; that data from the first set of information be displayed in accordance with properties of the first locale designation; and that data from the second set of information be displayed in accordance with the properties of the second locale designation. Further, the two displays of information must be simultaneously displayed on a display area.

Rather than being concerned about how to display multiple character sets and/or multiple languages, the present invention as claimed in claim 1 is concerned with the ability to set multiple locales so that the display characteristics associated with more than one locale can be used to display different information sets on the same display area. Johnson contains no teaching nor suggestion of simultaneous display of information based on designating certain portions of the information for display according to properties of a first locale and designating other portions of the information for display according to properties of a second locale. The Examiner is treating a

“language” and a “locale” as being synonymous. In fact, they are not synonymous. The language is what is ultimately seen on the screen, but how it is displayed is controlled by the locale setting. The locale includes meta-information such as the character set for display, the sort order associated with that character set, the search order, the time display order, and other such properties associated with the language of the display. Many languages can be displayed using the same locale setting, as is done in the prior art. However, by limiting the display to a single locale as is done by Johnson, subtle differences associated with the manner in which certain characters are displayed, sorted, etc. (such as the Spanish “á” character discussed above) will limit the ability of users of the system to make the best use of the displayed text.

With the present invention, text in one language can be displayed and sorted in one manner (based on the properties of a first locale) and text in another language can be displayed and sorted in a different manner (based on the properties of a second locale). This cannot be accomplished by Johnson, and nothing in Johnson teaches or suggests this claimed feature.

In fact, Johnson expressly teaches away from this capability. Referring to Col. 12, lines 49 - 51, Johnson states that “[t]ranslation members in dictionary mode translation rules 602 cannot be in sorted order for all languages at the same time.” By contrast, the present invention allows precisely that, that is, a column of French-language characters can be sorted according to properties associated with a French locale, and simultaneously, a column of information in Spanish-language characters can be sorted according to properties associated with a Spanish locale.

**C. Claims 13-32**

Claims 13 and 23 recite a graphical user interface (GUI) whereby locale designations are utilized to delineate display areas for displaying data pursuant to properties of the different locale designations. Claims 25 and 29 recite a system and computer program product, respectively, with the same functionality. Johnson contains no teaching or suggestion of displaying of information in a GUI such that a first display area displays data in accordance with properties of a first locale designation and a second display area is utilized to display data in accordance with properties of a second locale designation, nor a system or computer program product that performs this function. In Johnson, the same locale designation is utilized for all the displays. Johnson may be able to display different languages upon the same display area, but properties associated with a locale are not considered when displaying data in the GUI of Johnson. Different languages can be displayed, but, for example, when sorting the data on the GUI of Johnson, all of the sorting would be done in accordance with the properties of the designated locale, regardless of how many different languages are displayed on the GUI screen.

**8. CONCLUSION**

For the foregoing reasons applicants respectfully request this Board to overrule the Examiner's rejections and allow claims 1-32.

Respectfully submitted:

August 30, 2005  
Date



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## CLAIMS APPENDIX

### **CLAIMS INVOLVED IN THIS APPEAL:**

1. (Original) A method for displaying information in a display area comprising the steps of:

associating a first set of information with a first locale designation;

associating a second set of information with a second locale designation;

displaying data from said first set of information in accordance with properties of said first locale designation; and

displaying data from said second set of information in accordance with properties of said second locale designation, said data from said first and second set of information displayed simultaneously on the display area.

2. (Original) The method of claim 1, further comprising the steps of:

sorting said first set of information in accordance with properties of said first locale designation; and

sorting said second set of information in accordance with properties of said second locale designation.

3. (Original) The method of claim 2, wherein said first set of information is searchable in accordance with properties of said first locale designation and said second set of information is searchable in accordance with properties of said second locale designation.

4. (Original) The method of claim 1, wherein said step of displaying data from said first set of information comprises displaying data from said first set of information in a character set associated with said first locale designation; and said step of displaying data from said second set of information comprises displaying data from said second set of information in a character set associated with said second locale designation.

5. (Original) The method of claim 1, wherein said first locale designation and said second locale designation are different.

6. (Original) The method of claim 2, wherein said first locale designation is a system locale designation.

7. (Original) The method of claim 1, further comprising the step of:  
displaying data from a third set of information associated with a third locale designation,  
said data from said third set of information displayed simultaneously with said first and second  
set of data on the display area.

8. (Original) The method of claim 7, further comprising the steps of:

sorting said first set of information in accordance with properties of said first locale designation;

sorting said second set of information in accordance with properties of said second locale designation; and

sorting said third set of information in accordance with properties of said third locale designation.

9. (Original) The method of claim 8, wherein said first set of information is searchable in accordance with properties of said first locale designation, said second set of information is searchable in accordance with properties of said second locale designation, and said third set of information is searchable in accordance with properties of said third locale designation.

10. (Original) The method of claim 7, wherein said step of displaying data from said first set of information comprises displaying data from said first set of information in a character set associated with said first locale designation; said step of displaying data from said second set of information comprises displaying data from said second set of information in a character set associated with said second locale designation; and said step of displaying data from said third

set of information comprises displaying data from said third set of information in a character set associated with said third locale designation.

11. (Original) The method of claim 8, wherein said first locale designation is a system locale designation.

12. (Original) The method of claim 7, wherein said first, second, and third locale designations are different.

13. (Original) A graphical user interface (GUI) comprising:  
a first display area for displaying data from a first set of information in accordance with properties of a first locale designation; and  
a second display area for displaying data from a second set of information in accordance with properties of a second locale designation.

14. (Original) The GUI of claim 13, wherein said first and second locale designations are different.

15. (Original) The GUI of claim 14, wherein said first locale designation is a system locale designation.

16. (Original) The GUI of claim 13, wherein the data from said first set of information displayed in said first display area is sorted in accordance with properties of said first locale designation and the data from said second set of information displayed in said second display area is sorted according in accordance with properties of said second locale designation.

17. (Original) The GUI of claim 13, further comprising:  
a third display area for displaying data from a third set of information, said third set of information associated with a third locale designation.

18. (Original) The GUI of claim 17, wherein said first, second, and third locale designations are different.

19. (Original) The GUI of claim 17, wherein said first locale designation is a system locale designation, said second locale designation is a source locale designation, and said third locale designation is a target locale designation.

20. (Original) The GUI of claim 17, wherein said system locale designation, said source locale designation, and said target form part of a translation system interface.

21. (Original) The GUI of claim 17, wherein said first locale designation is associated with at least a first character set, said second locale designation is associated with at least a second character set, and said third locale designation is associated with at least a third character set.

22. (Original) The GUI of claim 17, wherein the data from said first set of information displayed in said first display area is sorted in accordance with properties of said first locale designation, the data from said second set of information displayed in said second display area is sorted in accordance with properties of said second locale designation, and the data from said third set of information displayed in said third display area is sorted in accordance with properties of said third locale designation.

23. (Original) A graphical user interface (GUI) comprising:  
a plurality of display areas;  
a first of said display areas for displaying source information associated with a source locale designation;  
one or more of said display areas for displaying target information, each of said one or more of said display areas for displaying target information corresponding to one of one or more target locale designations; and

other display areas not associated with said source locale designation or said one or more target locale designations associated with a system locale designation.

24. (Original) The GUI of claim 23, wherein:

said first of said display areas can be sorted and searched in accordance with properties of said source locale designation;

said one or more of said display areas can be sorted and searched in accordance with properties of corresponding ones of said one or more target locale designations; and

said other display areas can be sorted and searched in accordance with properties of said system locale designation.

25. (Original) A system for displaying information associated with multiple locales, said system comprising:

means for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and

means for displaying said first and second set of information.

26. (Original) The system of claim 25, further comprising:

means for sorting said first set of information in accordance with properties of said first locale designation and sorting said second set of information in accordance with properties of said second locale designation; and

means for searching said first and second sets of information.

27. (Original) The system of claim 25, further comprising:

means for associating a third set of information with a third locale designation; and

means for displaying said third set of information, said third set of information being displayed simultaneously with said first and second set of information.

28. (Original) The system of claim 27, further comprising:

means for sorting said third set of information in accordance with properties of said third locale designation; and

means for searching said third set of information.

29. (Original) A computer program product for displaying information associated with multiple locales, said computer program product comprising:

computer readable program code embodied in a computer readable medium, the computer readable program code comprising at least:

computer readable program code for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and computer readable program code for displaying said first set of information associated with said first locale designation and said second set of information associated with said second locale designation.

30. (Original) The computer program product of claim 29, further comprising:  
computer readable program code for sorting said first set of information in accordance with properties of said first locale designation and sorting said second set of information in accordance with properties of said second locale designation; and  
computer readable program code for searching said first and second sets of information.

31. (Original) The computer program product of claim 29 wherein said computer readable program code embodied in a computer readable medium further comprises:  
computer readable program code for associating a third set of information with a third locale designation; and  
computer readable program code for displaying said third set of information associated with said third locale designation.

32. (Original) The computer program product of claim 31, further comprising:

computer readable program code for sorting said third set of information in accordance with properties of said third locale designation; and

computer readable program code for searching said first and second sets of information.

**EVIDENCE APPENDIX**

No additional evidence is presented.

**RELATED PROCEEDINGS APPENDIX**

No related proceedings are presented.